

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

Civ. Case No. 12-2039 (GAG)

Vs.

COMMONWEALTH OF PUERTO RICO
and the PUERTO RICO POLICE BUREAU,

Defendants

**MOTION REQUESTING BRIEF ENLARGEMENT OF TIME
TO PRODUCE INFORMATION**

TO THE HONORABLE COURT:

COME NOW, Defendants, through their undersigned attorneys, and very respectfully allege and pray as follows:

1. On November 18, 2020, this Honorable Court entered a Transition Order requesting the Defendants of caption to comply with several benchmarks and targeted reporting dates. *See*, Docket No. 1614. One of the immediate requirements listed in the Order was that the Defendants had to notify, by December 15, 2020, to the Court, the Office of the Federal Monitor, and the United States Department of Justice (US DoJ) about i) existing personnel and contractors of Department of Public Safety (DPS) and the Puerto Rico Police Bureau (PRPB) designated as essential to the successful implementation of, and compliance with, the Agreement for Sustainable Reform and subsequent Orders being monitored, including personnel and contractors from the PRPB Reform Office, Technology Bureau, and SAEA, in accordance with Paragraph 233 of the Agreement, and ii) the steps the Commonwealth had taken or would take to retain the essential personnel and contractors noted above in their current positions through June 30, 2021.

2. Although the DSP and the PRPB have assembled most of the information requested by the Court, the PRPB respectfully requests additional time to cross-reference and validate the information gathered by the Department and the Bureau to further ensure the information to be produced to the Court is accurate and relevant as it relates to its November 18 Transition Order.

3. Based on the above, the Defendants respectfully request the deadline set by the Court be enlarged until December 18, 2020, to enable them to produce reliable and meaningful information to the Court.

WHEREFORE, the Defendants very respectfully request the Court to take notice of the above information and Grant the Defendants the opportunity to produce the information ordered by the Court by no later than December 18, 2020.

In San Juan, Puerto Rico, this 16th day of December, 2020.

s/Raúl E. Bandas
Raúl E. Bandas
USDC-PR No. 207809

s/Carlos M. Rivera-Vicente
Carlos M. Rivera-Vicente
USDC-PR No. 126304

s/Marta L. Rivera Ruiz
Marta L. Rivera Ruiz
USDC-PR No. 221201

s/Angel A. Valencia-Aponte
Angel A. Valencia-Aponte
USDC-PR No. 123905

Counsels for Defendants

Cancio, Nadal & Rivera, LLC
PO Box 364966
San Juan, PR 00936-4966
Ave. Muñoz Rivera 403
Hato Rey, Puerto Rico 00918-1145
Tel. (787) 767-9625
Fax: (787) 622-2238

Emails: rbandas@cnr.law
crivera@cnr.law
mrivera@cnr.law
angelvalencia@cnr.law

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing Motion Requesting Reconsideration of Order with the Clerk of the Court, using the CM/ECF System, which will send notification of such filing to all appearing parties and counsels using the Court's electronic system.

In San Juan, Puerto Rico, this 16th day of December 2020.

s/Raúl E. Bandas
Raúl E. Bandas-del Pilar
USDC-PR No. 207809
Counsel for Defendants